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Via ECFS

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**Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554**

**RE: Comment on VTCSecure Petition for Waiver filed July 6, 2016
WC Docket No. 10-191, CG Docket Nos. 03-123 and 10-51**

Dear Secretary Dortch:

I would fain hope that the FCC will give priority consideration to all of us, the Hearing people, who want to have a videophone and access to the Numbering Directory to be able to freely and, what should seemingly be a right, to make point-to-point calls to the Deaf people in our life.

I'm standing sure the FCC is well aware that there are many of us Hearing people who want and need this seemingly a right and freedom to make a direct video point-to-point calls to the Deaf people in our life. For example, parents, siblings, friends, co-workers, et al. All who use Sign Language themselves to communicate and thus do not need any assistance from the VRS interpreter. In fact, from the perspective of this Hearing person, a VRS interpreted call often falls short on many levels and is definitely not "functionally equivalent" to voice telephone services. But there could be a first-place blue ribbon winner! That being that Hearing people can make point-to-point calls themselves without this need of the VRS interpreter.

This is not a new problem. The subject has been approached numerous times. Although, it seems to continue to move further down the "to do" list of the FCC and major players in this the TRS business.

If I may draw your attention to a picture on the similar circumstances with the TTY evolutions. In the early 1980's there were local communities wherein the use of phone banks were installed and established to assist Deaf people to make TTY assisted calls (most funded by non-profit monies). It was to volunteer and sit and man a phone and a Baud computer and relay calls coming mostly from those old large teletype-machines. It was new and exciting. Thereafter, in a short time, Texas

got involved with the test pilot program which later fueled and began this the TDD Relay evolution. But, Hearing people were able to buy the equipment necessary (TTY/TDD) and make their own direct point-to-point calls without the assistance of the Communication Assistant (CA). At the same time, it is hypothetically reasonable to have considered if there was any fraud/abuse taking place? I personally never heard about anything happening – But you, the FCC, would know more about if that happened or not. Again, the 1980's, Texas, there was a pilot test for TTY/TDD Relay Services. I happened to be standing outside there at the Texas State building and by chance met someone involved in the test program. We chatted and almost immediately start talking about “why not Video”? So, as you can see I have had this on my mind for a very long time. And I wouldn't hesitate to venture a guess that there are a million more like me - Patient.

I used to have a video phone number that I paid extra for. Snap VRS and OJO had a “family and friend” program. I was able to make and receive direct video point-to-point calls from all the Deaf folks numbers listed in this TRS Numbering Directory. I found this ability very pleasing and “functionally equivalent” to voice telephone services. But I was stripped of the “family and friend” program when Snap VRS sold to Purple VRS. I contacted Purple and was informed that they do not support Hearing callers. So, I haven't been able to make direct video point-to-point calls for a few years now. This is a very painful experience for me a Hearing person who with life long connection to the Deaf community was shut out from making any more point-to-point calls. It's a travesty. VRS call are more suited for Taking Care of Business in the hearing world – Not for personal purposes beyond the brief and reserved communication. Sometimes having a 3rd person on the line ruins it.

Snap VRS, et al, have posted comments in the past supporting Hearing people being allowed to get access to the TRS Numbering Directory. The subject is somewhere in communications the FCC has entertained and or publicly posted.

I will suggest to the FCC to refresh this subject and give priority consideration to it first. Before you decide on this petition I ask you to make conditions with any approval on fixing this problem first.

From my understanding, the FCC entered a 5 year contract with VTCSecure for the development of a Neutral Platform (operating system) and again, therein approached this subject of making a provision available for Hearing people to have access to make the direct video point-to-point call. It is my understanding that VTCSecure has given the final Neutral Platform product to the FCC this past March 2016. In May 2016 I had a telephone conversation with a VTCSecure VP Sales agent. I learned that VTCSecure is not currently focusing on Hearing people to have the access to make point-to-point video calls. VTCSecure is focused on large corporations both here at home and abroad – even the United Nations! It seems to me an exciting potential VTCSecure has with regards to getting into the business of Call Center deployment and application. My notes indicate that its offering these services on a 5-agent minimum at the cost of \$4,000.00 a month per agent. We talked about the ACE, IPRS, ACD and Open Source. Also, that it is completely up to the FCC registration process to be able to get a phone number - for both me and

them. In the end, I was again disappointed to learn that VTCSecure was not focused on building out a provision for Hearing people to get into something that would allow us to be connected.

It is worthy applauding VTCSecure in this their approach to expand the capabilities for Deaf people to call directly to a company and be able to talk with this company directly point-to-point. I know jobs will be created and money will be saved from the expense of VRS.

But, I speak to you today as a Natural Person, a fellow human and citizen who pays taxes and fees (some earmarked for the great programs TRS has brought to fruition), not as a corporation with financial interest. To most of us it is not a matter of making money. But, to disregard any further such a large group of people who have every right and the ability to have the equal access to the TRS Numbering Directory is a travesty which its correction is long over due and should now have front and center attention.

When VTCSecure is allowed to connect its customers to the TRS Numbering Directory then it should be after the Hearing people who are the closest people to the Deaf Community that you can find in America. These people live and breath in the Deaf World are a strong interwoven connection in this life of Deaf America.

Respectfully submitted,

Charles Bullock